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FILED

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Clerk, U.S. District Court
District Of Montana
Great Falls

**ATTORNEYS FOR PLAINTIFF
UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**JONARY DAVID SANTOS-
ANTUNEZ,
KEVIN TORRES-OCHOA,
JOSHUA LEE HAGEN,
TOMI LEAH GRAY,
MARY ROCK BIG MAN,
JASON EARL NELSON,
CHRISTINA KAMRAN-
KOHNJANI,
MARISA ANN LYMAN and
SADEY KUST-MYERS,**

Defendants.

CR 16- 107 -BLG-SPW

INDICTMENT

**CONSPIRACY TO POSSESS WITH
INTENT TO DISTRIBUTE AND
DISTRIBUTE METHAMPHETAMINE**

Title 21 U.S.C. § 846

(Count I)

**(Penalty: If 500 or more grams of
methamphetamine is involved—mandatory
minimum ten years to life imprisonment,
\$10,000,000 fine, and at least five years
supervised release. If 50 grams or more of
methamphetamine is involved—mandatory
minimum five years to 40 years'
imprisonment, \$5,000,000 fine, and at least
four years supervised release)**

**POSSESSION WITH INTENT TO
DISTRIBUTE METHAMPHETAMINE**

Title 21 U.S.C. § 841(a)(1)

(Counts II & III)

(Penalty for Count II: Mandatory minimum ten years to life imprisonment, \$10,000,000 fine, and at least five years supervised release. Penalty for Count III: Mandatory minimum five years to 40 years' imprisonment, \$5,000,000 fine, and at least four years supervised release)

**DISTRIBUTION OF
METHAMPHETAMINE**

Title 21 U.S.C. § 841(a)(1)

(Counts IV-VI)

(Penalty: 20 years' imprisonment, \$1,000,000 fine, and at least three years supervised release)

**POSSESSION OF A FIREARM IN
FURTHERANCE OF A DRUG
TRAFFICKING CRIME**

(Counts VII & VIII)

Title 18 U.S.C. § 924(c)(1)(A)(i)

(Penalty: Mandatory minimum five years to life imprisonment, consecutive to any other sentence, \$250,000 fine, and five years supervised release)

**CONSPIRACY TO COMMIT MONEY
LAUNDERING**

(Count IX)

Title 21 U.S.C. § 1956(h)

(Penalty: 20 years' imprisonment, \$500,000 fine, and three years supervised release)

CRIMINAL FORFEITURE

18 U.S.C. § 924(d) and 21 U.S.C. § 853

**TITLE 21 PENALTIES MAY BE
ENHANCED BY PRIOR DRUG-
RELATED FELONY CONVICTIONS**

THE GRAND JURY CHARGES:

COUNT I

That beginning in or about 2014, and continuing until on or about October 13, 2016, at Billings, Lockwood, Crow Agency, and other locations in the State and District of Montana, and elsewhere, the defendants, JONARY DAVID SANTOS-ANTUNEZ, KEVIN TORRES-OCHOA, JOSHUA LEE HAGEN, TOMI LEAH GRAY, MARY ROCK BIG MAN, JASON EARL NELSON, CHRISTINA KAMRAN-KOHNJANI, MARISA ANN LYMAN and SADEY KUST-MYERS, together and with others both known and unknown to the Grand Jury, knowingly and unlawfully conspired and agreed to possess with the intent to distribute, and to distribute, in violation of 21 U.S.C. § 846, a substance containing a detectable amount methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

1. Defendants JONARY DAVID SANTOS-ANTUNEZ, KEVIN TORRES-OCHOA, JOSHUA LEE HAGEN, TOMI LEAH GRAY, and MARY ROCK BIG MAN knew that the object of the conspiracy involved 500 or more grams of a substance containing a detectable amount of methamphetamine and reasonably could have foreseen that conspiracy involved 500 or more grams of a substance containing a detectable amount of methamphetamine.

2. Defendants JASON EARL NELSON, CHRISTINA KAMRAN-KOHNJANI, MARISA ANN LYMAN and SADEY KUST-MYERS knew that the object of the conspiracy involved 50 grams or more of a substance containing a detectable amount of methamphetamine and reasonably could have foreseen that conspiracy involved fifty or more grams of a substance containing a detectable amount of methamphetamine.

COUNT II

That beginning in or around 2014, and continuing until on or about October 13, 2016, at Billings, Lockwood, Crow Agency, and elsewhere in the State and District of Montana, the defendants, JONARY DAVID SANTOS-ANTUNEZ, KEVIN TORRES-OCHOA, JOSHUA LEE HAGEN, TOMI LEAH GRAY, and MARY ROCK BIG MAN, knowingly possessed, with the intent to distribute, 500 or more grams of a substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

COUNT III

That beginning in or around 2014, and continuing until in or about October 2016, at Billings, and elsewhere in the State and District of Montana, the defendants, JASON EARL NELSON, CHRISTINA KAMRAN-KOHNJANI, MARISA ANN LYMAN and SADEY KUST-MYERS, knowingly possessed, with the intent to distribute, 50 or more grams of a substance containing a detectable

amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

COUNT IV

That on or about February 10, 2016, at Billings, in the State and District of Montana, the defendant, TOMI LEAH GRAY, knowingly distributed a substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

COUNT V

That on or about March 9, 2016, at Billings, in the State and District of Montana, the defendant, TOMI LEAH GRAY, knowingly distributed a substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

COUNT VI

That on or about March 10, 2016, at Billings, in the State and District of Montana, the defendant, TOMI LEAH GRAY, knowingly distributed a substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

COUNT VII

That on or about June 14, 2015, at Billings, in the State and District of Montana, the defendant, JASON EARL NELSON, knowingly possessed the following firearms:

- a Springfield Armory Model XDM-40 .40 caliber semi-automatic handgun (serial number MG188867);
- a Hi-Point Model CF380 .380 caliber semi-automatic handgun (serial number P872687); and
- a Springfield Armory Model XDM-45ACP Compact 3.8 .45 caliber semi-automatic handgun (serial number MG591315)

in furtherance of the drug trafficking crime charged in Count I above, a crime that may be prosecuted in a court of the United States, in violation of 18 U.S.C. § 924(c)(1)(A)(i).

COUNT VIII

That on or about March 17, 2016, at Lockwood, in the State and District of Montana, the defendant, JOSHUA LEE HAGEN, knowingly possessed any one or all of the following firearms, namely:

- a Glock Model 23 .40 caliber handgun (serial number FBH352);
- a Beretta 9mm pistol Model 92A1 (serial number K91402z);
- a Ruger P89 9mm handgun (serial number 305-67254);

- a Glock Model 22 .40 caliber handgun (serial number BAKL269);
- a Charter Arms Bulldog Pug 44 Special (serial number 51637);
- a Remington Model 770 7mm rifle (serial number M72050582);
- a Marlin .17 HMR caliber rifle, Model 917VS (serial number 94685381);
- a US Carbine .30 caliber rifle (serial number 78365); and
- a Siaga .223 caliber rifle (serial number H04161421)

in furtherance of the drug trafficking crime charged in Count I above, a crime that may be prosecuted in a court of the United States, in violation of 18 U.S.C. § 924(c)(1)(A)(i).

COUNT IX

That beginning in or around 2014, and continuing until on or about October 13, 2016, at Billings, and elsewhere in the State and District of Montana, the defendants, JONARY DAVID SANTOS-ANTUNEZ, KEVIN TORRES-OCHOA, MARY ROCK BIG MAN, and MARISA ANN LYMAN, knowingly conspired and agreed with others, both known and unknown to the Grand Jury, to commit certain offenses under 18 U.S.C. § 1956(a)(1)(A)(i), and knowingly conducted and attempted to conduct financial transactions affecting interstate commerce, which transactions involved the proceeds of specified unlawful activity, that is, conspiracy to possess with intent to distribute and distribute methamphetamine, and possess

with intent to distribute methamphetamine, as more fully described in Counts I, II and III above, and while conducting and attempting to conduct such financial transactions, the defendants knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity and they further conducted the financial transactions with the intent to promote the carrying on of the unlawful activities specified above, all in violation of 18 U.S.C. § 1956(h).

FORFEITURE ALLEGATION

As a result of the offenses charged in this indictment, the defendants, JONARY DAVID SANTOS-ANTUNEZ, KEVIN TORRES-OCHOA, JOSHUA LEE HAGEN, TOMI LEAH GRAY, MARY ROCK BIG MAN, JASON EARL NELSON, CHRISTINA KAMRAN-KOHNJANI, MARISA ANN LYMAN and SADEY KUST-MYERS, shall forfeit to the United States, pursuant to 21 U.S.C. § 853 and 18 U.S.C. § 924(d): (1) any property constituting and derived from any proceeds obtained, directly and indirectly, as a result of offenses; (2) any property used, and intended to be used, in any manner and part, to commit and facilitate the commission of the offenses; and (3) firearms and ammunition involved and

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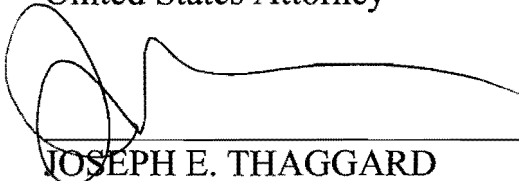
used in any knowing violation of 18 U.S.C. § 924.

A TRUE BILL.

Foreperson signature redacted. Original document filed under seal.



MICHAEL W. COTTER
United States Attorney



JOSEPH E. THAGGARD
Criminal Chief Assistant U.S. Attorney

Crim. Summons _____
Warrants ☒ _____
Bills _____